

# **EXHIBIT**

# **XX**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN)  ECF Case
This document relates to:	
<i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN)  ECF Case

**DECLARATION OF CHRISTIAN WAUGH**

I, CHRISTIAN WAUGH, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached, as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present at the World Trade Center Towers when the terrorist attacks of the World Trade Center Towers occurred.

4. I was a New York City Fireman with Division #1 and Ladder Company #5 in 2001. I was on driver detail that day, where I was assigned to drive a deputy chief as necessary.

5. I was on duty in New York City at the fire station in lower Manhattan when the first plane hit the tower. I saw the shadow of the plane and then heard the noise of the impact when the plane hit Tower 1.

6. The Deputy Chief and I jumped into the car and I immediately drove over to the World Trade Center site. We proceeded to set a command post station in the lobby of Tower #1. At the Command Post, I was assisting with assigning Fire and other personnel to various areas that needed assistance and gave them specific duties to attend to, such as particular areas for search and rescue assignments and fire extinguishment.

7. When the second plane hit Tower #2, the entire lobby of Tower #1 was filled with debris and smoke. As the buildings collapsed, I was overwhelmed and knocked down due to people running and debris falling. It was chaos. I then ran to try to get away from the buildings as they caved in and crumpled.

8. As a result of these terrorist attacks, I suffered the following specific injuries on September 11, 2001: I fell and suffered from right knee pain as well as spinal injuries and pain. I have spondylosis at C4-5, C5-6 and C6-7. I have had to endure a right knee replacement as well as back surgery.

9. I saw bodies of fellow firefighters and fellow workers, including our own Fire Department Chaplin. I assisted in carrying his body out of the lobby.

10. I sought medical attention for my injuries at St. Vincent's Hospital in New York City on September 12, 2001. Attached as Exhibit B to this Declaration is a true and correct copy of a portion of my medical records related to the treatment that I received following the September 11, 2001 terrorist attacks.

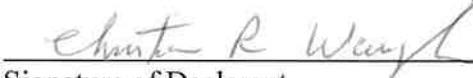
11. I suffered, and continue to suffer, severe emotional distress as a result of the above terrorist attacks. I suffer from anxiety and bouts of depression due to the traumatic events of these terrorist attacks.

12. I previously pursued a claim (Claim Number VCF 212-003964 to the best of my knowledge) through the September 11<sup>th</sup> Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for and awarded compensation. A copy of the letter I received from Attorneys Sullivan, Papin, et al is attached as Exhibit C.

12. I previously pursued a claim through the New York Fire Department Pension Fund and I was granted an accident disability retirement due to the injuries sustained on September 11<sup>th</sup>, 2001. A copy of the award letter is attached as Exhibit D.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 30 day of December 2019.

  
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Signature of Declarant

**EXHIBITS  
FILED  
UNDER SEAL  
(ECF No.  
5716)**